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Attorney for:
HEATHER STANLEY

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

HEATHER STANLEY,

Defendants.

Case No. 1:20-cr-00045 NONE-SKO

STIPULATION AND ORDER TO MODIFY
TERMS AND CONDITIONS OF RELEASE

TO: THE CLERK OF THE UNITED STATES DISTRICT COURT, HONORABLE DALE A.
DROZD AND ANGELA SCOTT, ASSISTANT UNITED STATES ATTORNEY:

COMES NOW Defendant, HEATHER STANLEY, by and through her attorney of
record, DAVID A. TORRES hereby requesting that the conditions of defendant's release include
the following:

Defendant is to provide a detailed itinerary to the assigned Pretrial Services Officer which
shall include the location of where defendant will travel and the time frame of when defendant
wishes to travel.

Declaration:

1. On February 26, 2020 Ms. Stanley was arraigned on the Indictment.
2. A detention hearing was held, and Ms. Stanley was ordered released upon conditions set forth by the Court.
3. Part of Ms. Stanley's terms of release included a travel restriction, specifically section

1 (7)(c), "travel restricted to the State of California, unless otherwise approved in
2 advance by PSO, and you may travel within the State of Nevada if approved for
3 residency, by PSO."

- 4 4. Ms. Stanley respectfully requests the court allow her to travel within the United States
5 so long as approved by the PSO. Additionally, she would be required to inform the
6 PSO, prior to travel, of her time frame of travel and the locations where she will be
7 visiting.

8 **IT IS SO STIPULATED.**

9 DATED: 3/17/20

Respectfully Submitted,
10 /s/ David A Torres
DAVID A. TORRES
Attorney for Defendant
HEATHER STANLEY

12 DATED: 3/17/20

/s/Angela Scott
13 ANGELA SCOTT
14 Assistant U.S. Attorney

15 **ORDER**

16 The Court DENIES the request to modify conditions of release and sets a bail review
17 hearing for Friday, March 20, 2020 at 2:00 p.m. to address the issues in this stipulation. In light
18 of the restrictions on entering the Courthouse, and General Orders 610 and 611, the government's
19 attorney and the defense counsel are encouraged to appear by telephone for the hearing in this
20 matter with each party using the following dial-in number and access code: **dial-in number 1-**
21 **877-411-9748; access code 3219139.** To the extent possible, defense counsel is encouraged to
22 waive their client's appearance. The Court will allow in-court oral waiver of a defendant's
23 appearance provided counsel informs Esther Valdez at 559-499-5788 no later than noon the day
24 before the hearing.

25 IT IS SO ORDERED.

26 Dated: March 18, 2020

/s/ Barbara A. McAuliffe
27 UNITED STATES MAGISTRATE JUDGE
28